From: <u>Hutchison, William P.</u>

To: Cora, Lori; Albert, Eric (ENRD) (Eric.Albert@usdoj.gov)

Subject: LPA - Liberty Insurance Policy Limits

Date: Tuesday, October 07, 2014 8:53:25 AM

Lori and Eric: As we fine tune the insurance policy limits information and the Consent Decree attachments, we intend to secure from Liberty confirmation of what we understand. We wanted to make sure you know that so far Liberty advises:

There are 12 confirmed policies for the years 1973 -1985 at \$100,000/policy year; those limits total \$1,200,000

There are 7 policy years (1966-1973) which are "unconfirmed" but evidenced by secondary evidence at \$100,000 per policy year totaling an additional \$700,000.

Liberty has been providing a defense to LPA under these policies and in addition has made some indemnity payments totaling \$62,959 which apply against the policy limits which are otherwise available. We understand and will confirm that these indemnity payments apply against the policies as to which claims are being assigned to the insurance trust.

We will plan to forward additional confirmation as soon as it is received. Please let us know if you have any questions about this. Thanks.

## Bill P. Hutchison



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